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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JACQUELINE BENJAMIN, BRYAN
GONZALEZ, and TAIWO KOYEJO, on behalf
of themselves and classes of those similarly
situated,

Plaintiffs,

vs.

B&H EDUCATION, INC., a corporation, dba
"MARINELLO SCHOOLS OF BEAUTY"; and
DOES 1 through 100,

Defendants.

Case No. CV 13-04993-VC

**JOINT STIPULATION PURSUANT TO
FED. R. CIV. P. 15(A)(2) REGARDING
FILING OF SECOND AMENDED
COLLECTIVE AND CLASS ACTION
COMPLAINT; SECOND AMENDED
COLLECTIVE AND CLASS ACTION
COMPLAINT**

Complaint Filed: October 25, 2013

/ Trial Date: Not Set

STIPULATION

Plaintiffs JACQUELINE BENJAMIN, PATRICIA CAULEY, BRYAN GONZALEZ, and TAIWO KOYEJO and Defendant B&H EDUCATION, INC., by and through their undersigned counsel in the above-captioned matter, hereby stipulate as follows:

WHEREAS, this case was initiated on October 25, 2013 when Plaintiffs filed their Complaint (ECF No. 1), and Plaintiffs filed a First Amended Collective and Class Action Complaint on April 8, 2014 (ECF No. 20);

WHEREAS, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, a party may amend its pleading with the written consent of the opposing party;

WHEREAS, the Court has set a deadline for amending the pleadings or adding parties of January 16, 2015;

WHEREAS, Plaintiffs propose to file a Second Amended Collective and Class Action Complaint, which is attached as Exhibit A to this Stipulation;

WHEREAS, Defendant does not object to the filing of Plaintiffs' proposed Second Amended Collective and Class Action Complaint;

WHEREAS, the Parties agree that Defendant shall have thirty (30) days from the date of filing of this Stipulation to file a responsive pleading to the Second Amended Collective and Class Action Complaint.

IT IS HEREBY STIPULATED, by and between Plaintiffs and Defendant, through their respective counsel of record, Plaintiffs may file the proposed Second Amended Collective and Class Action Complaint, attached hereto as Exhibit A, which shall be deemed filed as of the date of filing of this Stipulation and Defendant shall file its responsive pleading to the Second Amended Collective and Class Action Complaint no later than thirty (30) days from the date of filing of this Stipulation.

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1 IT IS SO STIPULATED.

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3 DATED: January 16, 2015

/s/ Chaya M. Mandelbaum

4 David A. Lowe
Chaya M. Mandelbaum
Michelle G. Lee
5 Bryan J. Schwartz
Adetunji Olude
6 Leon Greenberg
7 Dana Sniegocki
Counsel for Plaintiffs

8
9 DATED: January 16, 2015

/s/ Julie A. Vogelzang

10 Keith Zakarin
Julie A. Vogelzang
11 Counsel for Defendant

12 **ECF ATTESTATION**

13 Pursuant to Civil L.R. 5-1(i)(3), the filer attests that concurrence in the filing of this
14 document has been obtained from each of the other signatories thereto.

15
16 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

17
18 Dated: January 21, 2015



19 Judge Vince Chhabria
United States District Court